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13 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

19 Plaintiff,

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S NOTICE TO
JOIN AND ADOPT DEFENDANT
OTTO TRUCKING'S MOTION TO
COMPEL PAGE DEPOSITION**

20 v.

21 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
22

Defendants.

Trial Date: October 10, 2017

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1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:
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3 PLEASE TAKE NOTICE THAT Defendants Uber Technologies, Inc. and Ottomotto,
4 LLC (“Defendants”) hereby join and adopt Co-Defendant Otto Trucking, LLC’s (“Otto
5 Trucking”) Motion to Compel Deposition of Larry Page. In support of the Motion, Defendants
state as follows:

6 1. On July 17, 2017, Defendants and Otto Trucking conducted the deposition of
7 Alphabet CEO Larry Page at Wilson Sonsini Goodrich & Rosati, 601 California Avenue, Palo
8 Alto, California.

9 2. In a July 27, 2017 email, counsel for Otto Trucking requested a meet and confer
10 about Waymo producing Larry Page again for deposition and explained the basis for a second
11 deposition.

12 3. In a meet and confer call held on July 31, 2017, the Special Master set a briefing
13 schedule for Otto Trucking’s motion to compel a further deposition of Larry Page.

14 4. On August 2, 2017, Co-Defendant Otto Trucking filed its Motion to Compel
15 Deposition of Larry Page in accordance with the Special Master’s briefing schedule set after meet
16 and confer correspondence regarding the dispute.

17 5. Defendants join and adopt, as if set out verbatim herein, the arguments, authorities,
18 contentions, and prayers of Co-Defendant Otto Trucking set forth in Docket No. 1069 for the
19 reason that said response is equally applicable to Defendants in the above-captioned matter.

20 6. Defendants join and adopt Co-Defendant Otto Trucking’s Motion to best serve
21 justice and avoid unnecessary or duplicative effort, time, or expense to the parties involved.

22 WHEREFORE, Defendants hereby join and adopt Co-Defendant Otto Trucking’s Motion
23 to Compel Deposition of Larry Page (Dkt. 1069).

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1 Dated: August 2, 2017

MORRISON & FOERSTER LLP

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3 By: /s/ Arturo J. González
4 Arturo J. González

5 Attorneys for Defendants
6 UBER TECHNOLOGIES, INC.
7 and OTTOMOTTO LLC

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